

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

A.F., on behalf of J.F., and A.R., on behalf of  
B.R.,

Plaintiffs,

v.

CHARACTER TECHNOLOGIES, INC.;  
NOAM SHAZEER; DANIEL DE FREITAS  
ADIWARSANA; GOOGLE LLC;  
ALPHABET INC.,

Defendants.

Case No. 2:24-cv-01014-JRG-RSP

**UNOPPOSED MOTION TO FILE UNDER SEAL DECLARATIONS OF ANDY  
NAHMAN AND STEPHANIE G. HERRERA IN SUPPORT OF DEFENDANT  
CHARACTER TECHNOLOGIES, INC.'S MOTION TO COMPEL ARBITRATION**

Defendant Character Technologies, Inc. ("C.AI"), hereby files this unopposed motion for leave to file under seal: (1) the Declaration of Andy Nahman in Support of C.AI's Motion to Compel Arbitration and to Stay Proceedings Pending Arbitration; and (2) the Declaration of Stephanie G. Herrera in Support of C.AI's Motion to Compel Arbitration and to Stay Proceedings Pending Arbitration ("Supporting Declarations"). A Protective Order has not yet been entered in this action and C.AI seeks to file the Supporting Declarations under seal because they contain information, including usernames and email addresses, provided to C.AI by minor users J.F. and B.R. Although some information provided by minor users J.F. and B.R. appears to

be inaccurate, in an abundance of caution, C.AI currently seeks to maintain all such information under seal.

C.AI conferred with Plaintiffs in advance of the filing of this motion, and Plaintiffs do not oppose C.AI's request to seal. Pursuant to Local Rule CV-5(a)(7)(E), redacted versions of the Supporting Declarations will be filed within seven days.

Dated: March 10, 2025

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 10, 2025, I electronically submitted the foregoing document with the clerk of the United States District Court for the Eastern District of Texas, using the Court's CM/ECF system, which will send notification of such filing to all counsel of record who are deemed to have consented to electronic service.

/s/ *Melissa R. Smith*

Melissa R. Smith

**CERTIFICATE OF CONFERENCE**

Pursuant to Local Rule CV-7(i), I hereby certify that on March 5, 2025, Jonathan Blavin, Stephanie Herrera, and Andrew T. Gorham, counsel for C.AI, and Matthew Bergman, Meetali Jain, and Samuel F. Baxter, counsel for Plaintiffs, conferred by video conference regarding the issues in this motion, in accordance with the requirements of Local Rule CV-7(h). The parties reached agreement and Plaintiffs do not oppose this motion.

/s/ *Melissa R. Smith*

Melissa R. Smith